

EXHIBIT 51

7/17/24 Interview of GEICO investigators

On call

- OG: Zarka DSouza, Jarron
- Investigators: Keith Fischer (22yrs) and Peggy (10yrs), Michael Reed (18yrs)

Notes

- Describe SICM system, how and when you use it
 - This is how we got our cases, and how we document our notes, and close the case. Everything goes through SICM
 - Notes could be canvas, photos, interviews
 - 2-5 cases per day
 - Case data: Case number, day you got it, deadline for next entry
- Cathy: would you use SICM outside normal working hours?
 - Keith: yes. Used to access it 24hr/day. IN the past few weeks, GEICO restricted access. Have to take lunch, have to take breaks. This is all new, since this lawsuit was filed.
 - In the past, during covid, people were fired for keystrokes.
- Keith: yes, company gas card. Had to document mileage. Mileage could vary heavily depending your cases. Went all around getting EUOs (Examination Under Oath)
- Mike: I worked around Buffalo, covered 7 large counties. Lots of driving. Not unusual to have 3-4hr round-trip, excluding interview of insured. You were getting new cases assigned the whole time you were driving.
- Keith: everything in SICM was timestamped. But we often did it on the side on a word doc before putting it in SICM. Once you put it in SICM you got dinged for typos, grammar, etc. So we put it in MSWord first, did spellcheck.
- Keith: you got a raise based on your report card (needed 4.5 or 5), which was based on quality and turnaround. So investigators hid their work time, to get raises.
- Keith: They track everything, even number of copies
- Cathy: how did caseload change over your time at GEICO?
 - Keith: things were good until 2010 when they changed the manager. Before 2010, reasonable manager maintained decent caseloads. They brought in 3 headhunters who made things so tough that many investigators would retire.
 - Keith: example about driving infractions during work. Previously 3 infractions → do defensive driving. Then they changed the rules to penalize investigators more for infractions
 - Mike: when I started you got 10-12 cases per month. Mostly called "level 1" (go out do an interview). If you got any more than 4-5/week, your supervisor would divert the excess. Then it was 15-20 cases/month to get report card 5. Now it's 25-30.
 - In may 2020 I got 70 cases. Average case is 3hr, including setup, plan of action, etc. That 3hr does not include extra work like chasing people.
 - Mike: when Covid hit GEICO said we could do interviews by phone, that upped the caseload
 - Mike: if you're in lowest quartile of report card scores, you were on a "coaching plan" and had to talk to supervisor everyday
 - Cathy: would these notes be revealing?
 - Mike: supervisors were managed on CaseLife.

- Mike: there was no overtime. If you even tried to enter overtime, it took you extra hours to request it, and it would be denied. So that's why we just hid the work and tried to get a raise.
 - Cathy: talking to your supervisor, would you be honest about the drive time, or would you hide it even from them?
 - Mike: yes I would be honest with the supervisor.
 - Keith: GEICO has records of tolls (company EZ Pass), gas receipts, parking receipts, any other expenses
- Keith: reports had a few sections
- Keith: all us investigators were exNYPD. We know how to do these things. They were just overloading us.
 - Many text messages and emails between investigators, complaining about daily case assignments
 - Those 3 supervisors would testify how we were being overworked
- Jake: would you paste sidework from MSWord into SICM, all at once?
 - Yes
 - You just try to hit each case in SICM right before it turns from black (pre-deadline) to red (late)
- Keith: this used to be a good job, for post NYPD, where else are you gonna make \$90-100k/yr plus profitsharing, to work from home? "You're gonna work from home and go to Jones Beach" they say.
- Cathy: putting aside Covid (and zoom interviews instead of in person), did the nature of the work change while this caseload changed?
 - Keith and Mike: NO. Same amount of work as always, and against the same deadline.
- Cathy: how about during Covid?
 - GEICO briefly offered overtime for taking 10-15 more cases per month
 - You didn't have to travel for EUOs
 - But you still had to travel e.g. to PDs, to pick up police reports
 - Mike. My caseloads: May 2020: 60 cases, June 70 cases, July 18 (but vacation), ...
 - Mike: they were always
 - Mike: candidly, because I was ex-PD, I could get 15 police reports in 2min in a single trip. I could stretch this out to more hours on SICM, saying I made a few trips.
- Keith: you knew you were not getting new cases assigned after Fri afternoon. So if you had 10 due on Mon, then you would work the weekend, get 4 done each of Sat and Sun.
 - Might enter these in SICM over the weekend, or maybe Mon morning.
- Cathy: how many hours to do the paperwork (not the work) for a single case?
 - Mike: 2-3hr just for setup. Then running and reading backgrounds. Then running and reading prior claims. Then reading claim file and summarizing it. Then talking to the examiner.

Another system: ATLAS. Comprehensive record of all touches on a claim.

- This flow dictates referrals to SIU
- Past few years they changed the rules
 - Used to be 7 flags → SIU, now it's 2 flags → SIU
 - Since the cases get referred to SIU sooner, it adds work to the investigator (because fewer of the basic docs / info has been compiled before the investigation)

Cathy: how did GEICO ensure quality? Sounds like they mostly focused on turnaround time.

- Keith: you mostly got kudos for closing things quickly
- Sounds like there is a notion of different case types
- Checklist of thoroughness. Did you
 - Do scene canvas
 - Do face-to-face interviews vs phone
 - Interview the insured
 - ...
 - Did you find something where underwriting could re-eval the policy
 - This was the money question
 - Finding an “impact” in this sense was the holy grail
 - Impact could be unrelated to the claim and investigation. Is there another driver in the household? Are the keys left in the car? Is the car parked in the garage?
- Cathy: were you aware of people reviewing your work for quality/thoroughness?
 - Mike: Occasional audits to ensure protocols and thoroughness. Also your supervisors were managed on the same metrics
 - Keith: we submitted monthly reports to our supervisors: how many EUOs done, how many miles driven, etc. Also had to submit an annual report with similar figures. This is compared with calendar of actual scheduled EUOs.

Peggy: I was an “inside investigator” – no fieldwork. GEICO setup “diary points” – internal deadlines. Progressing paperwork on SIU cases, but not the fieldwork. Notes that you can have a lot of outside work that validly becomes just a small SICM entry. E.g., you can read 2hr of internet reports, then write 4 sentences in SICM.

- Keith: 75% of worktime was outside SICM; then just 25% in SICM

Keith: there was also extracurricular work.

- I was an RV expert, so I would get occasional calls (2-4/mo) being asked to help an adjuster on the side. Also training new investigators.
- Peggy: also I was a team leader, trainings, admin meetings. I worked in the building so I have passcard swipes.
 - I didn’t work at home besides during Covid.
 - Cathy: were you there more than 8hr/day?
 - Peggy: yes. But not weekends.